



## U.S. Department of Justice

## Criminal Division

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Fraud Section

October 23, 2024

**VIA EMAIL & FILE SHARE**

Tyrone J. Paylor  
 First Assistant Federal Public Defender  
 One Memphis Place  
 Memphis, TN 38103  
 Tyrone\_Paylor@fd.org

**Re: *United States v. Lisa Jeanine Findley, No. 2:24-cr-20145-JTF (W.D. Tenn.)***  
**Government's Fourth Production of Information**

Dear Mr. Paylor:

In response to your request for discovery filed on September 24, 2024 (ECF No. 32), please be advised that copies of the information described in the accompanying index have been sent to you via file share along with this accompanying letter. This is the government's fourth production of information. The information being produced to you in connection with this letter will be contained in a zip file labeled "U.S. v. Findley – Government Production #4." The Bates range for this production is DOJ-PROD-0000049639 – DOJ-PROD-0000049917.

Included in this production are recorded telephone calls made by the defendant while in federal custody in the Western District of Tennessee. As with the previous production, in an abundance of caution, the prosecution team asked an independent filter team to review these telephone calls. Following the independent filter team's review, the independent filter team redacted portions of certain telephone calls and withheld others in their entirety from the prosecution team. The prosecution team has included the redacted telephone calls in this production. We expect that the independent filter team will make a separate production to you consisting of both the unredacted versions of the redacted telephone calls as well as the telephone calls withheld in their entirety from the prosecution team.

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In this production, the government may have provided information and material that exceeds the scope of discovery mandated by the Federal Rules of Criminal Procedure, federal statute, or relevant case law. Any non-discoverable information and material provided has been voluntarily and solely as a matter of discretion.

The fact that certain non-discoverable information and material may be provided in no way obligates the government to provide all non-discoverable information and material, and the fact that certain non-discoverable information and material has been provided should not be taken as a

representation as to the existence or non-existence of any other non-discoverable information and material.

By opening this production, you agree that the produced information and material is sensitive and confidential, will be used only for purposes of the above-captioned case, and shall not be publicly disclosed in any way unless pre-authorized by the government or the Court.

\* \* \*

If you have any questions, please contact us and AUSA André at your convenience.

Sincerely,

/s/ Aaron Henricks

Aaron Henricks  
Trial Attorney

Christopher Fenton  
Trial Attorney

Cory E. Jacobs  
Assistant Chief

United States Department of Justice  
Criminal Division, Fraud Section

Enclosures:

- One File Share Link via Email
- Government Production #4 Index

Cc: AUSA Carroll L. André, III  
Clerk, U.S. District Court (w/o enclosures)